#### **EXHIBIT I**

# In re MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al., No. 09-50026

## GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of <u>James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto</u>

| James Barton<br>November 22, 2017  |                        |   |
|------------------------------------|------------------------|---|
| GUC Trust and New GM's Affirmative |                        | Plaintiffs and Participating  |
| Design                             | ations                 | Unitholders' Objections   |
| <b>Designation Begin</b>           | <b>Designation End</b> |   |
| 18:15                              | 18:16                  | 106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation). |
| 18:24                              | 19:7                   | 106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation). |
| 21:8                               | 21:17                  |   |
| 22:9                               | 22:14                  | 106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation). |
| 39:7                               | 39:12                  | 106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of  |

| James Barton<br>November 22, 2017               |                 |  |
|---|-----------------|--|
| GUC Trust and New GM's Affirmative Designations |                 | Plaintiffs and Participating Unitholders' Objections |
| Designation Begin                               | Designation End | Omitholders Objections                               |
|   |                 | the issues/ waste of time).                          |

## Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition Testimony of James Barton and the GUC Trust and New GM's Objections Thereto

| James Barton<br>November 22, 2017                                  |                        |                                      |  |
|--|------------------------|--------------------------------------|--|
| Plaintiffs and Participating Unitholders' Affirmative Designations |                        | GUC Trust and New GM's<br>Objections |  |
| <b>Designation Begin</b>   | <b>Designation End</b> |                                      |  |
| 6:20   | 6:24                   |                                      |  |
| 7:7  | 7:8                    |                                      |  |
| 7:25   | 8:6                    |                                      |  |
| 10:4   | 10:8                   |                                      |  |
| 10:15  | 11:4                   |                                      |  |
| 12:14  | 12:14                  |                                      |  |
| 12:21  | 12:23                  |                                      |  |
| 13:8   | 14:13                  |                                      |  |
| 14:15  | 15:4                   |                                      |  |
| 16:11  | 16:17                  |                                      |  |
| 17:18  | 17:19                  |                                      |  |
| 21:8   | 22:17                  |                                      |  |
| 23:11  | 23:19                  |                                      |  |
| 24:18  | 24:21                  |                                      |  |
| 31:2   | 31:4                   |                                      |  |
| 31:7   | 31:15                  |                                      |  |
| 34:12  | 34:15                  |                                      |  |
| 35:21  | 36:6                   |                                      |  |
| 36:22  | 36:24                  |                                      |  |
| 37:10  | 37:12                  |                                      |  |
| 37:21  | 38:7                   |                                      |  |

# GUC Trust and New GM's Counter-Designations of the Deposition Testimony of James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto

| James Barton<br>November 22, 2017                    |   |  |
|--|---|--|
| GUC Trust and New GM<br>Counter-Designation<br>Begin | Counter-Designation Counter-Designation End | Plaintiffs and Participating Unitholders' Objections   |
| 19:23  | 20:2  | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 20:5   | 20:5  | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 20:9   | 20:10                                       | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 20:12  | 20:14                                       | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 21:4   | 21:7  | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 23:20  | 24:1  | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 24:12  | 24:17                                       | Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)   |
| 32:22  | 33:9  | Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403). |
| 33:13  | 33:20                                       | Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403). |

# Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of James Barton and the GUC Trust and New GM's Objections Thereto

| James Barton<br>November 22, 2017                                  |                         |   |  |  |
|--|-------------------------|---|--|--|
| Plaintiffs and Participating Unitholders' Counter-<br>Designations |                         | GUC Trust and New GM Objections to Counter-             |  |  |
| Counter-Designation Begin  | Counter-Designation End | Designations  |  |  |
| 7:7  | 7:8                     | Relevance (401/402); Outside the Scope of FRCP 32(a)(6) |  |  |
| 8:4  | 8:6                     | Relevance (401/402); Outside the Scope of FRCP 32(a)(6) |  |  |
| 21:18  | 22:1                    |   |  |  |
| 24:18  | 24:21                   |   |  |  |
| 34:12  | 34:15                   |   |  |  |
| 36:17  | 36:24                   | Relevance (401/402); Outside the Scope of FRCP 32(a)(6) |  |  |
| 38:2   | 38:7                    | Relevance (401/402); Outside the Scope of FRCP 32(a)(6) |  |  |